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Via ECF

February 6, 2019

TO: Hon. Loretta A. Preska, USDJ Law Offices of Sanjay Chaubey
United States District Court 18 East 41 Street, Ste 1704
Southern District of New York New York, New York 10017
500 Pearl St. (212)563-4534
New York, NY 10007 Attorney for Defendants

Vivek Suri, Esq.,
Lead Attorney for Defendants
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Attorney for Defendants
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RE: Manta Industries, Ltd. v. Paul P. Law et al; Case No. 16-cv-8308-LAP

Honorable Judge:

I represent Plaintiff in the above action. Plaintiff does not oppose Mr. Suri's withdrawal as lead counsel in this case. Defendants failed to appear for their depositions that were so ordered in docket entries 46, 47, and 48. Defendants then failed to appear at rescheduled dates in December 2018.

However, Plaintiff requests that the Court issue an order resetting the same deadlines that were not met by Defendants that were ordered in the last three docket entries 46, 47 and 48 in this case. The previous orders set Defendants' depositions, allowed Plaintiff to add new parties and amend its complaint shortly after completion of the depositions and also extended Plaintiff's time to supplement its expert report.

Another issue is that Defendants failed to provide original authorizations for their tax returns. It is my understanding that Mr. Suri has those original authorizations because Mr. Suri provided copies of the authorizations to me. Plaintiff would request that those be turned over prior to Mr. Suri's withdrawal so that Plaintiff has ample time to order those returns prior to depositions.

Lastly, I would also request that any appearance for this motion be telephonic as I'm currently traveling.

Yours, etc.,

/s/B. Shamus O'Donniley, Esq.